

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

v.

JEFFREY RICHARD

No. 2:21-cr-00150-JAW

JOINT MOTION TO CONTINUE PRESENTENCE CONFERENCE

The United States of America and Jeffrey Richard, by and through their attorneys, respectfully move to continue the presentence conference in this case, currently scheduled for April 16.

The defendant pleaded guilty on July 17, 2023. The defendant's sentencing is scheduled for August 7. The Court has twice extended the sentencing date to provide the defendant with time to make additional restitution payments prior to sentencing. In his most recent continuance motion, filed on March 26, the defendant represented that he has recently been approved for a loan in an amount that may enable him to pay full restitution.

The parties request that the presentence conference be continued to a date closer in time to the August 7 sentencing. In light of the defendant's representations regarding his anticipated loan, it appears likely that the status of his restitution obligation will be materially different within the next few months. The defendant's payment of full restitution prior to sentencing would be a significant development in the case. The parties submit that it is appropriate to continue the presentence conference so the Court and the parties will have a clearer picture of the defendant's restitution obligation prior to the conference.

For the reasons stated above, the parties respectfully request that the Court continue the presentence conference to a date convenient to the Court closer in time to the August 7 sentencing date.

Respectfully submitted,

/s/ Craig M. Wolff
Craig M. Wolff
Assistant U.S. Attorney

/s/ Richard S. Berne
Attorney for Jeffrey Richard

/s/ Peter E. Rodway
Attorney for Jeffrey Richard

Dated: April 11, 2024

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2024, I electronically filed this **Joint Motion to Continue Presentence Conference** with the Clerk of Court using the CM/ECF system, which will send notification to the following:

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